



November 25, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephanie A. Joyce

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Re: Notice of Permitted *Ex Parte* Meeting, WC Docket Nos. 12-375 and 09-144

Dear Ms. Dortch:

On November 21, 2013, Securus Technologies, Inc. ("Securus"), represented by the undersigned counsel, met with Daniel Alvarez, Legal Advisor to Chairman Tom Wheeler, and Deena Shetler, Associate Bureau Chief of the Wireline Competition Bureau.

This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(3).

With regard to the interstate inmate rates recently adopted in the *Inmate Rate Order*,¹ Securus reiterated its concerns that they affect existing contracts and are below Securus's costs of service. Securus referred to its rate proposal of July 12, 2013, whereby the maximum charge for an interstate inmate-initiated telephone call would be \$8.00, no matter how long the call.² The new rates, by contrast, will make it difficult for Securus to continue providing service at many locations. Securus also noted the uncertainty that has been introduced into correctional operations by virtue of the new prohibition on recovering site commission costs in rates. Securus provided the case number of its appeal to the U.S. Court of Appeals for the D.C. Circuit: 13-1280.

Securus also referred to its then-pending Petition for Stay of Report and Order Pending Appeal which respectfully requested disposition by November 21, 2013. Securus stated that it intended to seek relief in at the D.C. Circuit if its Petition were not granted. Later that day, an order denying the Petition, as well as the similar petition of Global Tel*Link, was released.

¹ *Rates for Interstate Inmate Calling Services*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-113 ¶101 (rel. Sept. 26, 2013).

² WC Docket No. 12-375, Letter from Stephanie A. Joyce to Marlene H. Dortch, FCC, with Attachment (July 16, 2013).

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With regard to the Declaratory Ruling issued in WC Docket No. 09-144, Securus summarized for Mr. Alvarez the general operation of what the Bureau has termed “call routing services” by third-party VoIP-based providers. Securus stated that its Application for Review of the Declaratory Ruling remains pending, and noted that Millicorp filed an untimely Opposition to that Application. Securus stated that it intended to file a timely reply to the Opposition. Its reply was filed the following day.

Please do not hesitate to contact me with any questions: 202.857.6081.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Attachments

Cc: Daniel Alvarez, Legal Advisor to Chairman Tom Wheeler
Deena Shetler, Associate Bureau Chief, Wireline Competition Bureau

Via electronic mail